

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

ELEANOR and ROCCO CIOFOLETTI, and  
LARRY STOSPAL on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

SECURIAN FINANCIAL GROUP, INC.,  
MINNESOTA LIFE INSURANCE  
COMPANY, SECURIAN LIFE INSURANCE  
COMPANY, SHURWEST LLC and  
MINNESOTA MUTUAL COMPANIES, INC.,

Defendants.

Civil Action No.: 18-cv-03025-JNE-ECW

**MEET AND CONFER STATEMENT ON MOTION TO COMPEL**

Pursuant to Local Rule 7.1(a) and Federal Rule of Civil Procedure 37(a)(1), the undersigned counsel, representing Defendant Shurwest, LLC (“Shurwest”) in the above-captioned action, hereby certifies that he conferred with counsel for Plaintiffs on multiple occasions, including by email on January 28, 2021, February 4, 2021, and February 8, 2021, requesting that Plaintiffs’ counsel provide verifications to Plaintiffs’ interrogatory responses. No verifications have been received, and Shurwest’s Motion to Compel is therefore presented to the Court for determination as an opposed motion.

Dated: March 10, 2021

Respectfully submitted,

/s/ Jason M. Hopkins

---

Brooke D. Anthony (#0387559)

Philip J. Kaplan (#0389351)

**ANTHONY OSTLUND**

**BAER & LOUWAGIE P.A.**

3600 Wells Fargo Center

90 South Seventh Street

Minneapolis, Minnesota 55402

Tel: (612) 349-6969

Fax: (612) 349-6996

Email: banthony@anthonyostlund.com

pkaplan@anthonyostlund.com

*and*

Jason S. Lewis

(Texas No. 24007551 *pro hac vice*)

Jason M. Hopkins

(Texas No. 24059969 *pro hac vice*)

**DLA PIPER LLP (US)**

1900 N. Pearl St., Ste. 2200

Dallas, Texas 75201

Tel: (214) 743-4500

Fax: (214) 743-4545

Email: jason.lewis@dlapiper.com

jason.hopkins@dlapiper.com

*Attorneys for Defendant Shurwest, LLC*